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Diesel S.p.A.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DIESEL S.P.A.,

Plaintiff

v.

KRACEBAGS898, KUAILE2023, KUKUFASION, KURTGEIGER, KUWANBAG, LACOSK, LAKIBAG, LHZGOODBOY, LETSHAPPY, LIBERTY_BAG, LIGHTLUXURYBAG99, LILYSHOES1, LILINGG18, LITCHI BAG, LIVELY123, LOUISBAGS_18, LOUISEVIUTIONBAG, LOUISVUITTONS BAG, LOYALBAG9, LUBAG, LUXURIOUS_BAG, LUXURY_BAG_188, LUXURY_BAGSHOP888, LUXURY DESIGNER BAG1, LUXURY_LADY_BAG, LUXURY_LUXURIES, LUXURYBAG1122, LUXURYBAG2023, LUXURYBAG985, LUXURYBAGCO, LUXURYBAGS1923, LUXURYBRANDDESIGNER, LUXURYS BAG88 LUXURYS_BAGSSALE, LUXURYSHAND_BAG, LUXURYSHOULDERBAGS, MACROWOODS, MAIMAIMAI888, MARC_JACOBES, Civil Case No.: 24 Civ. 6169

AMENDED [PROPOSED]

1) TEMPORARY **RESTRAINING ORDER; 2) ORDER RESTRAINING** MERCHANT STOREFRONTS AND DEFENDANTS' ASSETS WITH THE FINANCIAL **INSTITUTIONS; 3) ORDER** TO SHOW CAUSE WHY A PRELIMINARY INJUNCTION **SHOULD NOT ISSUE; 4)** ORDER AUTHORIZING **BIFURCATED AND ALTERNATIVE SERVICE;** AND 5) ORDER **AUTHORIZING EXPEDITED DISCOVERY**

FILED UNDER SEAL

MARNI_BAG, MAX_SHOES_, MAYNOR88, MEDUSA_BAG, MEILV5656, MIRROROUALITYBAG, MIUMIUHANDBAGS. MJTOTEBAG, MM789, MMYSHOES, MOON BAG, MORE_BAG33, MOTORCYCLE_BAG, MR_FASHION, MUMOSHOES002, MYDAYS08, MY2024888, NANIESTORE, NBFA2022, NEISHOES668, NEVERFULL_BAGS, NEWBAG077, NICEBAG1, OGBAGS, OHO02, OK2023, OKK STORE, OKKY_SHOP, OOOOMYGOD, OOTD HANDBAG, ORGANIZER BAG, ORIG_EDITON, ORIGINALS_BAGS, PENGNABAG66688, PENPEN888, PERFECT_DH_STORE, PERFECTBAG5566, PINGBUOINGYUNBAG. PLAIN BAGS, PPCBAG19, PRACEBAGS898, PRADAHANDBAG, PRADAHANDBAGS, PROMISE_BAGS, PTJF8, QJYBAGS, QRACEBAGS666, RACEBAGS777, REALMADRID966, RELIEVE CLOTHING, ROMANTIC_BAGS666, RUEE, SADDLE_BAG8, SANJIANG CARGO, SANJIANG ITEMS, SANJIANG_PRODUCTS, SATISFIEDBAG, SCHOOLBAGS,

Defendants

GLOSSARY

<u>Term</u>	Definition	
Plaintiff or Diesel		
	Diesel S.p.A. kracebags898, kuaile2023, kukufasion, kurtgeiger, kuwanbag, lacosk, lakibag, letshappy, lhzgoodboy, liberty_bag, lightluxurybag99, lilingg18, lilyshoes1, litchi_bag, lively123, louisbags_18, louiseviutionbag, louisvuittons_bag, loyalbag9, lubag, luxurious_bag, luxury_bag_188, luxury_bagshop888, luxury_designer_bag1, luxury_lady_bag, luxury_luxuries, luxurybag1122, luxurybag2023, luxurybag985, luxurybag88 luxurys_bagssale, luxurybranddesigner, luxurys_bag88 luxurys_bagssale, luxuryshand_bag, luxuryshoulderbags, macrowoods, maimaimai888, marc_jacobes, marni_bag, max_shoes_, maynor88, medusa_bag, meilv5656, mirrorqualitybag, miumiuhandbags, mjtotebag, mm789, mmyshoes, moon_bag, more_bag33, motorcycle_bag, mr_fashion, mumoshoes002, my2024888, mydays08, naniestore, nbfa2022, neishoes668, neverfull_bags, newbag077, nicebag1, ogbags, oho02, ok2023, okk_store,	
	okky_shop, oooomygod, ootd_handbag, organizer_bag, orig_editon, originals_bags, pengnabag66688, penpen888, perfect_dh_store, perfectbag5566, pingbuqingyunbag, plain_bags, ppcbag19, pracebags898, pradahandbag, pradahandbags, promise_bags, ptjf8, qjybags, qracebags666, racebags777, realmadrid966, relieve_clothing, romantic_bags666, ruee, saddle_bag8, sanjiang_cargo, sanjiang_items, sanjiang_products, satisfiedbag, and schoolbags	
DHgate	Dunhuang Group d/b/a DHgate.com, an online marketplace and e-commerce platform which allows manufacturers, wholesalers and other third-party merchants, like Defendants, to advertise, distribute, offer for sale, sell and ship their wholesale and retail products originating from China directly to consumers worldwide and specifically to consumers residing in the U.S., including New York	
Epstein Drangel	Epstein Drangel LLP, counsel for Plaintiff	
New York Address	244 Madison Ave, Suite 411, New York, New York 10016	
Complaint	Plaintiff's Complaint	
Application	Plaintiff's <i>ex parte</i> Application for: 1) a temporary restraining order; 2) an order restraining Merchant Storefronts (as defined <i>infra</i>) and Defendants' Assets (as defined <i>infra</i>) with the Financial Institutions (as defined <i>infra</i>); 3) an order to show cause why a preliminary injunction should not issue; 4) an order authorizing bifurcated and alternative service and 5) an order authorizing expedited discovery	
Iesurum Dec.	Declaration of Stefano Iesurum in Support of Plaintiff's	

	Application	
Nastasi Dec.	Declaration of Gabriela N. Nastasi in Support of Plaintiff's	
	Application	
Diesel Products	Fashion apparel products, including but not limited to high-	
	quality jeans, apparel and accessories for women, men and	
	children created by Diesel	
Diesel Marks	U.S. Trademark Registration Nos.: 1,498,698 for "DIESEL"	
	for a variety of goods in Class 25; 1,564,710 for "DIESEL" for	
	a variety of goods in Class 25; 1,989,390 for a variety of goods	
	in Classes 3, 9, 14, 18, 24 and 25; 3,063,829 for "DIESEL	
	FARM" for a variety of goods in Classes 29 and 33; 3,524,221	
	for "DIESEL" for a variety of goods in Classes 11, 20 and 21;	
	3,956,724 for "DIESEL BLACK GOLD" for a variety of goods	
	in Classes 18 and 25; 4,268,431 for "DIESEL" for a variety of	
	goods in Class 35; 4,835,318 for "DIESEL BAD" for a variety	
	of goods in Class 3; 5,812,708 for "DIESEL SPIRIT OF THE	
	BRAVE" for a variety of goods in Class 3; 5,899,446 for	
	"DIESEL" for a variety of goods in Class 9; 6,313,073 for "DIESEL SOUND OF THE BRAVE" for a variety of goods in	
	Class 3; 6,891,537 for "DIESEL LIBRARY" for a variety of	
	goods in Classes 18 and 25; 6,891,563 for "DIESEL" for a	
	variety of goods in Class 10; 7,257,006 for "DIESEL" for a	
	variety of goods in Class 32; 7,369,396 for "DIESEL" for a	
	variety of goods in Classes 9, 35, 36, 41 and 42; 1,605,656 for	
	for a variety of goods in Class 25;	
	1,939,141 for for a variety of goods in Classes 3,	
	9, 14, 18, 24 and 25; 2,376,399 for for a	
	variety of goods in Classes 14, 18 and 25; 3,225,322 for	
	11, 10 and 25, 5,225,522 101	
	for a variety of goods in Classes 3, 9, 14, 18 and	
	BAD	
	UND	
	25: 5 363 006 for for a variety of goods in Class 2:	
	25; 5,363,096 for for a variety of goods in Class 3;	

	5,653,098 for for a variety of goods in Class 25; 5,701,776 for for a variety of goods in Class 3;
	6,733,921 for DIESEL for a variety of goods in Class 25;
	and 6,891,565 for for a variety of goods in Class 3
Counterfeit Products	Products bearing or used in connection with the Diesel Marks, and/or products in packaging and/or containing labels bearing the Diesel Marks, and/or bearing or used in connection with marks that are confusingly similar to the Diesel Marks and/or products that are identical or confusingly similar to the Diesel Products
Infringing Listings	Defendants' listings for Counterfeit Products
User Accounts	Any and all websites and any and all accounts with online marketplace platforms such as DHgate, as well as any and all as yet undiscovered accounts with additional online marketplace platforms held by or associated with Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them
Merchant Storefronts	Any and all User Accounts through which Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them operate storefronts to manufacture, import, export, advertise, market, promote, distribute, display, offer for sale, sell and/or otherwise deal in Counterfeit Products, which are held by or associated with Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them
Defendants' Assets	Any and all money, securities or other property or assets of Defendants (whether said assets are located in the U.S. or abroad)
Defendants' Financial Accounts	Any and all financial accounts associated with or utilized by any Defendants or any Defendants' User Accounts or Merchant Storefront(s) (whether said account is located in the U.S. or abroad)
Financial Institutions	PayPal Inc. ("PayPal"), Payoneer Inc. ("Payoneer"), DHgate (e.g., DHpay.com), PingPong Global Solutions, Inc. ("PingPong") and Airwallex (Hong Kong) Limited ("Airwallex")

Third	Party	Service
Provid	lers	

Online marketplace platforms, including, without limitation, those owned and operated, directly or indirectly, by DHgate, as well as any and all as yet undiscovered online marketplace platforms and/or entities through which Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them manufacture, import, export, advertise, market, promote, distribute, offer for sale, sell and/or otherwise deal in Counterfeit Products which are hereinafter identified as a result of any order entered in this action, or otherwise

On this day, the Court considered Plaintiff's ex parte application for the following: 1) a temporary restraining order; 2) an order restraining Merchant Storefronts and Defendants' Assets with the Financial Institutions; 3) an order to show cause why a preliminary injunction should not issue; 4) an order authorizing in part bifurcated and alternative service and 5) an order authorizing expedited discovery against Defendants, Third Party Service Providers and Financial Institutions in light of Defendants' intentional and willful offerings for sale and/or sales of Counterfeit Products. A complete list of Defendants is attached hereto as Schedule A, which also includes links to Defendants' Merchant Storefronts and Infringing Listings. Having reviewed the Application, Declarations of Stefano Iesurum and Gabriela N. Nastasi, along with exhibits attached thereto and other evidence submitted in support thereof, the Court makes the following findings of fact and conclusions of law:

Plaintiff's allegations are assumed to be true solely for the purpose of adjudicating its request for this Order.

PRELIMINARY FACTUAL FINDINGS & CONCLUSIONS OF LAW

- 1. Diesel, launched in 1978 by Renzo Rosso, is an Italian fashion company specializing in high-quality jeans, apparel and accessories for women, men and children ("Diesel Brand").
- 2. The Diesel Products are marketed under the Diesel Marks. The Diesel Brand is recognized for its premium fashion designs and its playful advertising campaigns.
- 3. The Diesel Products are sold direct to consumers via Diesel's official website, https://shop.diesel.com/en/, and distributed through various channels of trade in the United States and abroad and via multi-brand retailers including, but not limited to, Nordstrom, Bloomingdales and Farfetch.
- Recently, Diesel has undergone a rapid revitalization since Belgian designer Glenn 4. Martens joined the Diesel as Creative Director in 2020. The Diesel Brand has since enjoyed

¹ Where a defined term is referenced herein and not defined herein, the defined term should be understood as it is defined in the Glossary.

heightened attention across various media outlets including, The Business of Fashion, Harper's Bazaar, Fashion United and The New York Times, among others.

- 5. The Diesel Products typically retail for between \$45.00 - \$2,700.00.
- 6. While Diesel has gained significant common law trademark and other rights in its Diesel Marks and Diesel Products through use, advertising and promotion, Diesel also protected its valuable rights by filing for and obtaining federal trademark registrations.
- 8. For example, Diesel owns the following U.S. Trademark Registration Nos.: 1,498,698 for "DIESEL" for a variety of goods in Class 25; 1,564,710 for "DIESEL" for a variety of goods in Class 25; 1,989,390 for a variety of goods in Classes 3, 9, 14, 18, 24 and 25; 3,063,829 for "DIESEL FARM" for a variety of goods in Classes 29 and 33; 3,524,221 for "DIESEL" for a variety of goods in Classes 11, 20 and 21; 3,956,724 for "DIESEL BLACK GOLD" for a variety of goods in Classes 18 and 25; 4,268,431 for "DIESEL" for a variety of goods in Class 35; 4,835,318 for "DIESEL BAD" for a variety of goods in Class 3; 5,812,708 for "DIESEL SPIRIT OF THE BRAVE" for a variety of goods in Class 3; 5,899,446 for "DIESEL" for a variety of goods in Class 9; 6,313,073 for "DIESEL SOUND OF THE BRAVE" for a variety of goods in Class 3; 6,891,537 for "DIESEL LIBRARY" for a variety of goods in Classes 18 and 25; 6,891,563 for "DIESEL" for a variety of goods in Class 10; 7,257,006 for "DIESEL" for a variety of goods in Class 32; 7,369,396 for "DIESEL" for a variety of goods in Classes 9, 35, 36, 41 and 42; 1,605,656



for

for a variety of goods in Class 25; 1,939,141 for



for a variety

of goods in Classes 3, 9, 14, 18, 24 and 25; 2,376,399 for



for a variety of goods

in Classes 14, 18 and 25; 3,225,322 for



for a variety of goods in Classes 3, 9, 14, 18





and 25; 5,363,096 for

for a variety of goods in Class 3; 5,653,098 for

for a variety of goods in Class 25; 5,701,776 for

for a variety of goods in Class 3:

6.733,921 for DIESEL for a variety of goods in Class 25; and 6,891,565 for

for a variety of goods in Class 3. The Diesel Marks are currently in use in commerce in connection with the Diesel Products. The Diesel Marks were first used in commerce on or before the dates of first use as reflected in the respective registrations attached to the Complaint as Exhibit C.

- 9. The success of the Diesel Products is due in part to Diesel's marketing and promotional efforts. These efforts include advertising and promotion through social media, Diesel's website (available at https://shop.diesel.com/en/) and print and internet-based advertising.
- 10. Diesel's success is also due to its use of the highest quality materials and processes in making the Diesel Products.
- 11. Additionally, Diesel owes a substantial amount of the success of the Diesel Products to its consumers and word-of-mouth buzz that its consumers have generated.
- Diesel's efforts, the quality of Diesel's products and the word-of-mouth buzz 12. generated by its consumers have made the Diesel Marks and Diesel Products prominently placed in the minds of the public. Members of the public and retailers have become familiar with the Diesel Marks and Diesel Products and have come to associate them exclusively with Diesel. Diesel has

acquired a valuable reputation and goodwill among the public as a result of such associations.

- 13. Diesel has gone to great lengths to protect its interests in the Diesel Products and the Diesel Marks. No one other than Diesel and its authorized licensees and distributors are authorized to manufacture, import, export, advertise, offer for sale or sell any goods utilizing the Diesel Marks, or use the Diesel Marks in connection with goods or services or otherwise, without the express permission of Diesel.
- 14. Defendants are manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying and/or offering for sale Counterfeit Products through Defendants' User Accounts and Merchant Storefronts with DHgate (see **Schedule A** for links to Defendants' Merchant Storefronts and Infringing Listings).
- 15. Defendants are not, nor have they ever been, authorized distributors or licensees of the Diesel Products. Neither Plaintiff, nor any of Plaintiff's authorized agents, have consented to Defendants' use of the Diesel Marks, nor has Plaintiff consented to Defendants' use of marks that are confusingly similar to, identical to and constitute a counterfeiting or infringement of the Diesel Marks.
- 16. Plaintiff is likely to prevail on its Lanham Act and related common law claims at trial.
- 17. As a result of Defendants' infringements, Plaintiff, as well as consumers, are likely to suffer immediate and irreparable losses, damages and injuries before Defendants can be heard in opposition, unless Plaintiff's Application for *ex parte* relief is granted:
 - a. Defendants have offered for sale and sold substantiand Counterfeit Products in the United States that infringe the Diesel Marks;

- b. Plaintiff has xwell founded that xnox Counterfeit Products wilk appear in the marketplace; that consumers may be misled, confused and disappointed by the quality of these Counterfeit Products, resulting in injury to Plaintiff's reputation and goodwill; and that Plaintiff may suffer loss of sales for the Diesel Products; and
- If Plaintiff proceeds
 Plaintiff has well-founded fears that ut they proceed on notice to Defendants on this Application, Defendants will: (i) secret, conceal, destroy, alter, sell-off, transfer or otherwise dispose of or deal with Counterfeit Products or other goods that infringe the Diesel Marks, the means of obtaining or manufacturing such Counterfeit Products, and records relating thereto that are in their possession or under their control, (ii) inform their suppliers and others of Plaintiff's claims with the result being that those suppliers and others may also secret, conceal, sell-off or otherwise dispose of Counterfeit Products or other goods infringing the Diesel Marks, the means of obtaining or manufacturing such Counterfeit Products, and records relating thereto that are in their possession or under their control, (iii) secret, conceal, transfer or otherwise dispose of their ill-gotten proceeds from its sales of Counterfeit Products or other goods infringing the Diesel Marks and records relating thereto that are in their possession or under their control and/or (iv) open new User Accounts and Merchant Storefront under new or different names and continue to offer for sale and sell Counterfeit Products with little to no consequence.
- 18. The balance of potential harm to Defendants of being prevented from continuing to profit from their illegal and infringing activities if a temporary restraining order is issued is faix outweighed by the potential harm to Plaintiff, its business, the goodwill and reputation built up in and associated with the Diesel Marks and to its reputations if a temporary restraining order is not

issued.

- 19. Public interest favors issuance of the temporary restraining order in order to protect Plaintiff's interests in and to its Diesel Marks, and to protect the public from being deceived and defrauded by Defendants' passing off of their substandard Counterfeit Products as Diesel Products.
 - 20. Plaintiff has not publicized its request for a temporary restraining order in any way.
- 21. Service on Defendants via electronic means is reasonably calculated to result in proper notice to Defendants.
- 22. If Defendants are given notice of the Application, they are likely to secret, conceal, transfer or otherwise dispose of their ill-gotten proceeds from their sales of Counterfeit Products or other goods infringing the Diesel Marks. Therefore, good cause exists for granting Plaintiff's request for an asset restraining order. It typically takes the Financial Institutions a minimum of five (5) days after service of the Order to locate, attach and freeze Defendants' Assets and/or Defendants' Financial Accounts and it is anticipated that it will take the Third Party Service Providers a minimum of five (5) days to freeze Defendants' Merchant Storefronts. As such, the Court allows enough time for Plaintiff to serve the Financial Institutions and Third Party Service Providers with this Order, and for the Financial Institutions and Third Party Service Providers to comply with the Paragraphs I(B)(1) and I(C)(1) of this Order, respectively, before requiring service on Defendants.
- 23. Similarly, if Defendants are given notice of the Application, they are likely to destroy, move, hide or otherwise make inaccessible to Plaintiff the records and documents relating to Defendants' manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying, offering for sale and/or sale of Counterfeit Products. Therefore, Plaintiff has good cause to be granted expedited discovery.

ORDER

Based on the foregoing findings of fact and conclusions of law, Plaintiff's Application is hereby **GRANTED** as follows:

I. Temporary Restraining Order

- A. IT IS HEREBY ORDERED, as sufficient cause has been shown, that Defendants are hereby restrained and enjoined from engaging in any of the following acts or omissions in the United States (with the exception of the acts and omissions described in paragraphs 6-8 below, which shall apply worldwide) for fourteen (14) days from the date of this order, and for such further period as may be provided by order of the Court:
- manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying, offering for sale, selling and/or otherwise dealing in Counterfeit Products, or any other products bearing the Diesel Marks and/or marks that are confusingly similar to, identical to and constitute a counterfeiting or infringement of the Diesel Marks;
- operation of Defendants' User Accounts and Defendants' Merchant Storefronts, including, without limitation, continued operation of Defendants' User Accounts and Merchant Storefronts in violation of this Order;
- 3) directly or indirectly infringing in any manner Plaintiff's Diesel Marks;
- using any reproduction, counterfeit, copy or colorable imitation of Plaintiff's Diesel
 Marks to identify any goods or service not authorized by Plaintiff;
- the Diesel Marks on or in connection with Defendants' manufacturing, importing, exporting, advertising, marketing, promoting, distributing, offering for sale, selling and/or otherwise dealing in Counterfeit Products;

- using any false designation of origin or false description, or engaging in any action which is likely to cause confusion, cause mistake and/or to deceive members of the trade and/or the public as to the affiliation, connection or association of any product manufactured, imported, exported, advertised, marketed, promoted, distributed, displayed, offered for sale or sold by Defendants with Plaintiff, and/or as to the origin, sponsorship or approval of any product manufactured, imported, exported, advertised, marketed, promoted, distributed, displayed, offered for sale or sold by Defendants and Defendants' commercial activities and Plaintiff;
- secreting, concealing, destroying, altering, selling off, transferring or otherwise disposing of and/or dealing with: (i) Counterfeit Products and/or (ii) any computer files, data, business records, documents or any other records or evidence relating to their User Accounts, Merchant Storefronts or Defendants' Assets and the manufacture, importation, exportation, advertising, marketing, promotion, distribution, display, offering for sale and/or sale of Counterfeit Products;
- 8) effecting assignments or transfers, forming new entities or associations, or creating and/or utilizing any other platform, User Account, Merchant Storefront or any other means of importation, exportation, advertising, marketing, promotion, distribution, display, offering for sale and/or sale of Counterfeit Products for the purposes of circumventing or otherwise avoiding the prohibitions set forth in this Order; and
- knowingly instructing any other person or business entity to engage in any of the activities referred to in subparagraphs I(A)(1) through I(A)(8) above and I(B)(1) and I(C)(1) below.

- B. IT IS HEREBY ORDERED, as sufficient cause has been shown, that Defendants and all persons in active concert and participation with them who receive actual notice of this Order, including the Third Party Service Providers and Financial Institutions who satisfy those requirements and are identified in this Order are hereby restrained and enjoined from engaging in any of the following acts or omissions for fourteen (14) days from the date of this order, and for such further period as may be provided by order of this Court:
- secreting, concealing, transferring, disposing of, withdrawing, encumbering or paying Defendants' Assets from or to Defendants' Financial Accounts until further ordered by this Court.
- C. IT IS HEREBY ORDERED, as sufficient cause has been shown, that immediately upon receipt of service of this Order, Defendants and all persons in active concert and participation with them who receive actual notice of this Order, including the Third Party Service Providers who satisfy those requirements, are restrained and enjoined from engaging in any of the following acts or omissions for fourteen (14) days from the date of this order, and for such further period as may be provided by order of this Court:
- operation of Defendants' User Accounts and Defendants' Merchant Storefronts, including, without limitation, continued operation of Defendants' User Accounts and Merchant Storefronts in violation of this Order; and
- instructing, aiding, or abetting Defendants and/or any other person or business entity in engaging in any of the activities referred to in subparagraphs I(A)(1) through I(A)(8), I(B)(1) and I(C)(1) above, including, without limitation, by providing services necessary for Defendants to continue operating Defendants' User Accounts and Merchant Storefronts in violation of this Order.

II. Order to Show Cause Why A Preliminary Injunction Should Not Issue And Order Of Notice

appear before the Court through	thex.Wnitedx.Statesx.Districtx.Countx.forxthex.Southernx.Districtx.ofx.Newx.Yorkx.atx.500x.Reark on September 12
Microsoft Teams	Street/40xFoley/Sequence/New/York;/New/Xork/Aver/XAver
by dialing 646-453-4442, entering the	<u>2:30</u> _p.m. or at such other time that this Court deems appropriate, why a
meeting code	preliminary injunction, pursuant to Fed. R. Civ. P. 65(a), should not issue.
pressing pound	IT IS FURTHER ORDERED that opposing papers, if any, shall be filed electronically with
(#).	the Court and served on Plaintiff's counsel by delivering copies thereof to the office of
	Epstein Drangel LLP at 60 East 42 nd Street, Suite 1250, New York, NY 10165, Attn: Jason September 9
	M. Drangel on or before Augustia , 2024. Plaintiff shall file any Reply
	papers on or before September 11 XAXIQUISAN 36N , 2024.
C.	IT IS FURTHER ORDERED that Defendants are hereby given notice that failure to appear

The parties shall

c. IT IS FURTHER ORDERED that Defendants are hereby given notice that failure to appear at the show cause hearing scheduled in **Paragraph II(A)** above may result in the imposition of a preliminary injunction against them pursuant to Fed. R. Civ. P. 65, which may take effect immediately upon the expiration of this Order, and may extend throughout the length of the litigation under the same terms and conditions set forth in this Order.

III. <u>Asset Restraining Order</u>

A. IT IS FURTHER ORDERED pursuant to Fed. R. Civ. P. 64 and 65 and N.Y. C.P.L.R. 6201 and this Court's inherent equitable power to issue provisional remedies ancillary to its authority to provide final equitable relief, as sufficient cause has been shown, that within five (5) days of receipt of service of this Order, the Financial Institutions shall locate and attach Defendants' Financial Accounts and/or Defendants' Assets and shall provide written confirmation of such attachment to Plaintiff's counsel.

IV. Order Authorizing Bifurcated and Alternative Service by Electronic Means

- A. IT IS FURTHER ORDERED pursuant to Fed. R. Civ. P. 4(f)(3), as sufficient cause has been shown, that service may be made on, and shall be deemed effective as to all Defendants if it is completed by the following means:
- delivery of: (i) PDF copies of this Order together with the Summons and Complaint, and (ii) a link to a secure website (including NutStore, a large mail link created through Rmail.com and via website publication through a specific page dedicated to this Lawsuit accessible through ipcounselorslawsuit.com) where each Defendant will be able to download PDF copies of this Order together with the Summons and Complaint, and all papers filed in support of Plaintiff's Application seeking this Order to Defendants' e-mail addresses to be determined after having been identified by DHgate pursuant to Paragraph V(C).
- B. IT IS FURTHER ORDERED, as sufficient cause has been shown, that such alternative service by electronic means ordered herein shall be deemed effective as to Defendants, Third Party Service Providers and Financial Institutions through the pendency of this action.
- C. IT IS FURTHER ORDERED, as sufficient cause has been shown, that such alternative service by electronic means ordered herein shall be made within five (5) days of the Financial Institutions and Third Party Service Providers' compliance with **Paragraphs**III(A) and V(C) of this Order.
- D. IT IS FURTHER ORDERED, as sufficient cause has been shown, that the Clerk of the Court shall issue a single original summons directed to all Defendants as listed in an attachment to the summons that will apply to all Defendants.

- E. IT IS FURTHER ORDERED, as sufficient cause has been shown, that service may be made and shall be deemed effective as to the following if it is completed by the below means:
- delivery of: (i) a PDF copy of this Order, or (ii) a link to a secure website where PayPal Inc. will be able to download a PDF copy of this Order via electronic mail to PayPal Legal Specialist at EEOMALegalSpecialist@paypal.com;
- 2) delivery of: (i) a PDF copy of this Order, or (iii) a link to a secure website where DHgate will be able to download a PDF copy of this Order via electronic mail to patrol@dhgate.com;
- delivery of: (i) a PDF copy of this Order, or (ii) a link to a secure website where Payoneer Inc. will be able to download a PDF copy of this Order via electronic mail to thirdpartyrequests@payoneer.com;
- delivery of: (i) a PDF copy of this Order, or (ii) a link to a secure website where PingPong Global Solutions Inc. will be able to download a PDF copy of this Order via electronic mail to legal-int@pingpongx.com; and
- delivery of: (i) a PDF copy of this Order, or (ii) a link to a secure website where Airwallex will be able to download a PDF copy of this Order via electronic mail to kking@maglaw.com.

V. Order Authorizing Expedited Discovery

- A. IT IS FURTHER ORDERED, as sufficient cause has been shown, that:
- 1) Within fourteen (14) days after receiving service of this Order, each Defendant shall serve upon Plaintiff's counsel a written report under oath providing:
 - a. their true name and physical address;

- b. the name and location and URL of any and all websites that Defendants own and/or operate and the name, location, account numbers and URL for any and all User Accounts and Merchant Storefronts on any Third Party Service Provider platform that Defendants own and/or operate;
- c. the complete sales records for any and all sales of Counterfeit Products, including but not limited to number of units sold, the price per unit, total gross revenues received (in U.S. dollars) and the dates thereof;
- d. the account details for any and all of Defendants' Financial Accounts, including, but not limited to, the account numbers and current account balances; and
- e. the steps taken by each Defendant, or other person served to comply with SectionI, above.
- Plaintiff may serve interrogatories pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure as well as Local Civil Rule 33.3 of the Local Rules for the Southern and Eastern Districts of New York and Defendants who are served with this Order shall provide written responses under oath to such interrogatories within fourteen (14) days of service to Plaintiff's counsel.
- Plaintiff may serve requests for the production of documents pursuant to Fed. R. Civ. P. 26 and 34, and Defendants who are served with this Order and the requests for the production of documents shall produce all documents responsive to such requests within fourteen (14) days of service to Plaintiff's counsel.
- B. IT IS FURTHER ORDERED, as sufficient cause has been shown, that within five (5) days of receipt of service of this Order the Financial Institutions served with this Order shall identify any and all of Defendants' Financial Accounts and/or Defendants' Assets, and

provide Plaintiff's counsel with a summary report containing account details for any and all such accounts, which shall include, at a minimum, identifying information for Defendants, including contact information for Defendants (including, but not limited to, mailing addresses and e-mail addresses), account numbers and account balances for any and all of Defendants' Financial Accounts and confirmation of said compliance with this Order.

C. IT IS FURTHER ORDERED, as sufficient cause has been shown, that within five (5) days of receipt of service of this Order, the Third Party Service Providers served with this Order shall identify any and all of Defendants' User Accounts and Merchant Storefronts, and provide Plaintiff's counsel with a summary report containing account details for any and all User Accounts and Merchant Storefronts, which shall include, at a minimum, identifying information for Defendants and Defendants' User Accounts and Defendants' Merchant Storefronts, contact information for Defendants (including, but not limited to, mailing addresses and e-mail addresses) and confirmation of said compliance with this Order.

D. IT IS FURTHER ORDERED, as sufficient cause has been shown, that:

- 1) Within fourteen (14) days of receiving actual notice of this Order, all Financial Institutions who are served with this Order shall provide Plaintiff's counsel all documents and records in their possession, custody or control (whether located in the U.S. or abroad) relating to any and all of Defendants' Financial Accounts and/or Defendants' Assets, including, but not limited to, documents and records relating to:
 - a. account numbers;
 - b. current account balances;

- any and all identifying information for Defendants, Defendants' User Accounts and Defendants' Merchant Storefronts, including, but not limited to, names, addresses and contact information;
- d. any and all account opening documents and records, including, but not limited to, account applications, signature cards, identification documents and if a business entity, any and all business documents provided for the opening of each and every of Defendants' Financial Accounts;
- e. any and all deposits and withdrawals during the previous year from each and every one of Defendants' Financial Accounts and any and all supporting documentation, including, but not limited to, deposit slips, withdrawal slips, cancelled checks and account statements; and
- f. any and all wire transfers into each and every one of Defendants' Financial Accounts during the previous year, including, but not limited to, documents sufficient to show the identity of the destination of the transferred funds, the identity of the beneficiary's bank and the beneficiary's account number.

E. IT IS FURTHER ORDERED, as sufficient cause has been shown, that:

- Within fourteen (14) days of receipt of service of this Order, the Third Party Service

 Providers served with this Order shall provide to Plaintiff's counsel all documents and records in its possession, custody or control (whether located in the U.S. or abroad) relating to Defendants' User Accounts and Defendants' Merchant Storefronts, including, but not limited to, documents and records relating to:
 - a. any and all User Accounts and Defendants' Merchant Storefronts and account details, including, without limitation, identifying information and account numbers

- for any and all User Accounts and Defendants' Merchant Storefronts that Defendants have ever had and/or currently maintain with the Third Party Service Providers that were not previously provided pursuant to Paragraph V(C);
- b. the identities, location and contact information, including any and all e-mail addresses of Defendants that were not previously provided pursuant to Paragraph V(C);
- c. the nature of Defendants' businesses and operations, methods of payment, methods for accepting payment and any and all financial information, including, but not limited to, information associated with Defendants' User Accounts and Defendants' Merchant Storefronts, a full accounting of Defendants' sales history and listing history under such accounts and Defendants' Financial Accounts with any and all Financial Institutions associated with Defendants' User Accounts and Defendants' Merchant Storefronts; and
- d. Defendants' manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying, offering for sale and/or selling of Counterfeit Products, or any other products bearing the Diesel Marks and/or marks that are confusingly similar to, identical to and constitute an infringement of the Diesel Marks.

VI. Security Bond

A. IT IS FURTHER ORDERED that Plaintiff shall place security in the amount of Five-thousand Dollars (\$5,000.00) with the Court which amount is determined adequate for the payment of any damages any person may be entitled to recover as a result of an improper or wrongful restraint ordered hereunder.

VII. Sealing Order

A. IT IS FURTHER ORDERED that Plaintiff's Complaint and exhibits attached thereto, and Plaintiff's *ex parte* Application and the Declarations of Stefano Iesurum and Gabriela N. Nastasi in support thereof and exhibits attached thereto, and this Order shall remain sealed until the Financial Institutions and Third Party Service Providers comply with **Paragraphs I(B)-(C)**, **III(A)** and **V(C)** of this Order.

SO ORDERED.

SIGNED this $\frac{28th}{2000}$ day of August ______, 2024, at $_{2:13}$ __p.m.

Dale E. Ho, UNITED STATES DISTRICT JUDGE
New York, New York

No.	Defendant	Infringing Listing	Merchant Storefront
		https://www.dhgate.com/product/designer-bag-purse-white-bag-	
1	kracebags898	nappa-luxury/969268962.html	https://www.dhgate.com/store/21958845#pd-sellerinfo-storename
	I	https://www.dhgate.com/product/white-nappa-woman-shoulder-	
2	kuaile2023	designer-crossbody/974668194.html	https://www.dhgate.com/store/21911104#pd-sellerinfo-storename
	ladatorion	https://www.dhgate.com/product/denim-womens-designer-diesl-	
3	kukufasion	bag-crossbody/942740802.html	https://www.dhgate.com/store/21815945#pd-sellerinfo-storename
	kurtanian	https://www.dhgate.com/product/mirror-quality-luxury-designer-	
4	kurtgeiger	best-bag-womens/930915535.html	https://www.dhgate.com/store/21917945#pd-sellerinfo-storename
	kuwanhad	https://www.dhgate.com/product/retro-bag-designe-famous-	
5	kuwanbag	quality-pochette/957539703.html	https://www.dhgate.com/store/21930078#pd-sellerinfo-storename
	lacosk	https://www.dhgate.com/product/y2k-shoulder-bag-for-man-	
6	lacusk	womens-crossbody/963101650.html	https://www.dhgate.com/store/21154535#pd-sellerinfo-storename
	lakibag	https://www.dhgate.com/product/handbag-designer-bag-luxury-	
7	takibag	handbags-shoulder/929220140.html	https://www.dhgate.com/store/21929190#pd-sellerinfo-storename
	letshappy	https://www.dhgate.com/product/designer-shoulder-bag-woman-	
8	тетапарру	handbag-crossbody/949267166.html	https://www.dhgate.com/store/21958683#pd-sellerinfo-storename
	lhzgoodboy	https://www.dhgate.com/product/fashion-woman-shoulder-bags-	
9		square-underarm/959428418.html	https://www.dhgate.com/store/21892811#pd-sellerinfo-storename
	liberty_bag	https://www.dhgate.com/product/designer-bag-purse-white-bag-	
10	tiborty_bug		https://www.dhgate.com/store/21960687#pd-sellerinfo-storename
	lightluxurybag99	https://www.dhgate.com/product/shoulder-bags-luxury-women-	
11	tigrittuxur y bugoo	top-handle-handbags/958041939.html	https://www.dhgate.com/store/21960199#pd-sellerinfo-storename
	lilingg18	https://www.dhgate.com/product/handle-designer-bag-womens-	
12	11116510		https://www.dhgate.com/store/21679036#pd-sellerinfo-storename
	lilyshoes1	https://www.dhgate.com/product/s-handbag-1dr-designer-bag-	
13	utyonooo1	white-tote-purse/962199773.html	https://www.dhgate.com/store/21958299#pd-sellerinfo-storename
	litchi_bag	https://www.dhgate.com/product/luxurys-leather-mens-	
14		designers-clutch-bag/940810967.html	https://www.dhgate.com/store/21917155#pd-sellerinfo-storename
	lively123	https://www.dhgate.com/product/diese-shoulder-bags-women-	
15		top-handle-half/949956637.html	https://www.dhgate.com/store/21946722#pd-sellerinfo-storename
	louisbags_18	https://www.dhgate.com/product/designer-bag-purse-white-bag-	
16	iodisnags_10		https://www.dhgate.com/store/21588602#pd-sellerinfo-storename
	louiseviutionbag	https://www.dhgate.com/product/designer-bag-purse-white-bag-	
17	todiocviationibag	nappa-luxury/959781106.html	https://www.dhgate.com/store/21859713#pd-sellerinfo-storename

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18		best-bag-womens/939183733.html	https://www.dhgate.com/store/21910346#pd-sellerinfo-storename
	loyalbag9	https://www.dhgate.com/product/fashion-flap-jingle-women-	
19		shoulder-bags-soft/913304526.html	https://www.dhgate.com/store/21923046#pd-sellerinfo-storename
	luhag	https://www.dhgate.com/product/evening-bags-disel-jingle-bag-	
20	lubag	designer-luxury/941764754.html	https://www.dhgate.com/store/21816242#pd-sellerinfo-storename
	luxurious_bag	https://www.dhgate.com/product/fashion-shoulder-messenger-	https://www.dhgate.com/store/21851432?dspm=pcen.pd.soldby.store.dNg
21		bag-mens-wallet/949675976.html	Wbv9xULMIIk760Q7k&resource_id=#pd-sellerinfo-storename
	luxury_bag_188	https://www.dhgate.com/product/designer-bags-shoulder-bag-	https://www.dhgate.com/store/21858738?dspm=pcen.pd.soldby.store.Pc
22		totes-real-leather/951412399.html	WtNaBT1WrB0wLpTGz1&resource_id=#pd-sellerinfo-storename
	luxury_bagshop888	 https://www.dhgate.com/product/2024-new-quality-designer-dis-	https://www.dhgate.com/store/21702699?dspm=pcen.pd.soldby.store.f5E
23	,_ 0 .	mini-fashion/973681481.html	GnMi3R5090X3afxmU&resource_id=#pd-sellerinfo-storename
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24		pouch-pu-leather/928573103.html	<u>OrwFzxMqcZWG62Ahl&resource_id=#pd-sellerinfo-storename</u>
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		https://www.dhgate.com/product/designer-bag-crossbody-bag-	https://www.dhgate.com/store/21925422?dspm=pcen.pd.soldby.store.Xzv
25		fashionable-shoulder/953596302.html	Xd0FCVxUtkOBJ2e2s&resource_id=#pd-sellerinfo-storename
	-	https://www.dhgate.com/product/designer-crossbody-bag-	https://www.dhgate.com/store/21925420?dspm=pcen.pd.soldby.store.nLH
26		fashion-shoulder-bag/922249039.html	<u>a4SoTvOTwipwUHP0d&resource_id=#pd-sellerinfo-storename</u>
	luxurybag1122	https://www.dhgate.com/product/shoulder-bags-tote-bag-high-	https://www.dhgate.com/store/21913788?dspm=pcen.pd.soldby.store.B40
27		quality-designer/901596527.html	6r5vUhI5ekR3y3uGN&resource_id=#pd-sellerinfo-storename
	luxurybag2023	https://www.dhgate.com/product/ggs-louiseity-bag-viutonity-lvs-	https://www.dhgate.com/store/21845244?dspm=pcen.pd.soldby.store.L9tS
28		evening-bags/818464378.html	CcTB402JoHuAF3fU&resource_id=#pd-sellerinfo-storename
	luxurybag985	https://www.dhgate.com/product/handle-designer-bag-womens-	https://www.dhgate.com/store/21901453?dspm=pcen.pd.soldby.store.RyM
29	, ,	shoulder-bag-flap/899905495.html	F0DzzkBPpJzW2AVov&resource_id=#pd-sellerinfo-storename
	luxurybagco	https://www.dhgate.com/product/designer-leather-shoulder-bag-	https://www.dhgate.com/store/21962030?dspm=pcen.pd.soldby.store.a4c
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30		luxury-classic/953478666.html	9lGQMqUuVsb6d78ar&resource_id=#pd-sellerinfo-storename

	luxurybags1923	https://www.dhgate.com/product/designer-diese-for-women-	https://www.dhgate.com/store/21961899?dspm=pcen.pd.soldby.store.FSS
31		multi-color-mini/949447065.html	5VE4ghP4T4kDyQlSa&resource_id=#pd-sellerinfo-storename
31			SVE4giiF414kDyQtSa&iesouice_iu-#pu-setteriiiio-storename
	luvuruhranddasignar	https://www.dhgate.com/product/handle-designer-bag-womens-	https://www.dhgate.com/store/21814296?dspm=pcen.pd.soldby.store.qVb
32	-	shoulder-bag-flap/881783839.html	cZxOfv78T6fXrWD3q&resource_id=#pd-sellerinfo-storename
32		Siloutuer-bag-itap/881/83839.html	CZXOTV76T6IXIWD3q&resource_lu=#pu-setteriffio-storeflaffie
	luxurys_bag88	https://www.dhgate.com/product/mirror-quality-luxury-designer-	https://www.dhgate.com/store/21940456?dspm=pcen.pd.soldby.store.JLgc
33		best-silver/932923933.html	O8kgmyRbcmXE8sFp&resource_id=#pd-sellerinfo-storename
33		Dest-Silver/932923933.11tml	OokgiiiyhbciiixEosrparesource_id=#pd-setteriiiio-storename
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34		uniguang-2024-nanunetu/932321022.ntmt	<u>qomaibzngzon ixauraresource_lu-#pu-setteriino-storename</u>
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35		advanced-texture-fashion/968901287.html	mTWZVKkbEon2U4tWBR&resource_id=#pd-sellerinfo-storename
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	luxuryshoulderbags	https://www.dhgate.com/product/hat-gift-designer-bag-	https://www.dhgate.com/store/21915782?dspm=pcen.pd.soldby.store.mZ
36		handbags-shoulder-bags/928286126.html	NFTF59PzhG2Q4zGIE9&resource_id=#pd-sellerinfo-storename
	maarawaada	https://www.dbgata.com/product/diasala.bag.1dr.luyun/waman	https://www.dhgata.com/storo/210224022denm=noon.nd.coldby.storo.ag0
37	macrowoods		https://www.dhgate.com/store/21832402?dspm=pcen.pd.soldby.store.ag0
3/		shoulder-bag/874249543.html	SqKOfCLvx5KMeUoIi&resource_id=#pd-sellerinfo-storename
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38		dies-bag-double/921573426.html	sSFy6eEGw6ZehrgWK&resource_id=#pd-sellerinfo-storename
	mara igaahaa	https://www.dhgate.com/product/classic-flap-1dr-silver-leather-	https://www.dhgate.com/store/21940463?dspm=pcen.pd.soldby.store.sXA
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39		designer/969627255.html	p8NFEB2aQoTWgp0V1&resource_id=#pd-sellerinfo-storename
1 40	marni hag	https://www.dhgate.com/product/fashion-the-tote-best-silver-	https://www.dhgate.com/store/products/21918778.html#st-navigation-
40		bag-luxury-lady/930283180.html	<u>products</u>
		hatten of the country	bethree //www.db.goto.com/store/040005000d-mm-
			https://www.dhgate.com/store/21966523?dspm=pcen.pd.soldby.store.zm5
41		nappa-luxury/951379537.html	FzK6pUeG28TzWXtaT&resource_id=#pd-sellerinfo-storename
	mavnor88	https://www.dhgate.com/product/cool-1dr-silver-real-leather-	https://www.dhgate.com/wholesale/products/8aaac7268dc10160018dc17
42	,	designer-man/957937469.html	8fa8308bc.html#pd-sellerinfo-storename

	medusa_bag	https://www.dhgate.com/product/luxurys-leather-mens-	https://www.dhgate.com/store/21910331?dspm=pcen.pd.soldby.store.zZH
	meuusa_bag	designers-clutch-bag/937671770.html	D43qKMwJVRPnn4K0M&resource_id=#pd-sellerinfo-storename
43		uesigners-ctutch-bag/95/6/1/70.html	D45qKMWJVKFIIII4K0M&IeSource_iu=#pu-setteriiiio-storenaine
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44		bag-woman-cross/849058111.html	w9vXTDaClxclOEMTH&resource_id=#pd-sellerinfo-storename
	mirrorqualitybag	https://www.dhgate.com/product/designer-bag-tote-bag-	https://www.dhgate.com/store/21947073?dspm=pcen.pd.soldby.store.qbft
45		shoulder-bag-dis-italy/956665375.html	<u>L8C4U0qUOvgl0EVg&resource_id=#pd-sellerinfo-storename</u>
	miumiuhandbags	https://www.dhgate.com/product/fashion-clutch-underarm-	https://www.dhgate.com/store/21914254?dspm=pcen.pd.soldby.store.SL6
46		luxury-shoulder-bag/964546982.html	DNBC3BbxLUNG9ZCMt&resource_id=#pd-sellerinfo-storename
	mitatahaa	https://www.dhgata.com/product/woman.docignor.hag.chaulder	https://www.dhgata.com/storo/210072012denm-noon.nd.coldby.storo.6Ed
	mjtotebag	1 '	https://www.dhgate.com/store/21907301?dspm=pcen.pd.soldby.store.6Fd
47		bag-flap-jingle/897136507.html	HMBbD8OeB8O9Lllga&resource_id=#pd-sellerinfo-storename
	mm789	https://www.dhgate.com/product/handle-designer-womens-	https://www.dhgate.com/store/21909157?dspm=pcen.pd.soldby.store.17F
48		shoulder-bag-flap/974677021.html	mKmAk7p2ft8S94bA9&resource_id=#pd-sellerinfo-storename
	mmyshoes	https://www.dhgate.com/product/mirror-quality-1dr-designer-	https://www.dhgate.com/store/21966527?dspm=pcen.pd.soldby.store.WP
49	•	bags-womens-luxury/964618536.html	VrArEb3zDb0y5Lwcta&resource_id=#pd-sellerinfo-storename
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	moon_bag	https://www.dhgate.com/product/womens-top-handle-shoulder-	https://www.dhgate.com/store/21918096?dspm=pcen.pd.soldby.store.a15
50	moon_bug	mens-genuine-leather/928984301.html	Dpalg6Sz6KdvnGNHp&resource_id=#pd-sellerinfo-storename
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51		dingdang-womens/946865252.html	p54AEHQT47AFviidJ&resource_id=#pd-sellerinfo-storename
	motorcycle_bag	https://www.dhgate.com/product/designer-fashion-denim-	https://www.dhgate.com/store/21859100?dspm=pcen.pd.soldby.store.Cu
52		underarm-bag-evening/862007088.html	M9A1DFQKylAmCRp3AH&resource_id=#pd-sellerinfo-storename
	mr_fashion	https://www.dhgate.com/product/letter-d-shoulder-bag-fashion-	https://www.dhgate.com/store/21815948?dspm=pcen.pd.soldby.store.Z1A
53	_ _	designer-genuine/966410274.html	6oSvz7lvqOGCgSpDE&resource_id=#pd-sellerinfo-storename
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	mumoshoes002	https://www.dhgate.com/product/mirror-quality-fashion-silver-	https://www.dhgate.com/store/21904908?dspm=pcen.pd.soldby.store.J87g
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54		bag-crossbody/923366355.html	DD8U8vQnBkyXg2st&resource_id=#pd-sellerinfo-storename

	mv2024000	https://www.dhgata.com/product/designer.hag.luyuru.handhaga	https://www.dhgata.com/atora/2102422E2danm=noon.nd.coldby.atora.uk0
	my2024888	1	https://www.dhgate.com/store/21934225?dspm=pcen.pd.soldby.store.uk9
55		shoulder-bags/941697589.html	3nndThRkg7u2PLGX2&resource_id=#pd-sellerinfo-storename
	mydays08	https://www.dhgate.com/product/designer-bag-handbags-	https://www.dhgate.com/store/21959274?dspm=pcen.pd.soldby.store.puJT
56		shoulder-bags-women/966038745.html	3LwUvwi1QFpkBTw4&resource_id=#pd-sellerinfo-storename
	naniestore	https://www.dhgate.com/product/women-s-fashion-underarm-	https://www.dhgate.com/store/21934831?dspm=pcen.pd.soldby.store.GT9
57		pouch-designer-bag/943850790.html	3HfUr8w7vKxD2xXO3&resource_id=#pd-sellerinfo-storename
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58		designer-bag-man/967567734.html	a6L2ULhA6KbhJyRq9&resource_id=#pd-sellerinfo-storename
	neishoes668	https://www.dhgate.com/product/designer-bag-luxurious-with-	https://www.dhgate.com/store/21931205?dspm=pcen.pd.soldby.store.GHZ
59		box-pouchette/949007749.html	BUvtg8RgoogWtMRg7&resource_id=#pd-sellerinfo-storename
	neverfull_bags	https://www.dhgate.com/product/womens-handle-bag-shoulder-	https://www.dhgate.com/store/21940460?dspm=pcen.pd.soldby.store.EE3
60		genuine-leather/937892376.html	g9rFbnlRC5G9yu8yL&resource_id=#pd-sellerinfo-storename
	newbag077	https://www.dhgate.com/product/designer-bags-luxury-woman-	https://www.dhgate.com/store/21911875?dspm=pcen.pd.soldby.store.zgH
61	newbago//	shoulder-bags/950315195.html	cs7VmeXNcMDGilzGm&resource_id=#pd-sellerinfo-storename
01		Shoulder-pags/350515135.html	cs/vinexiveribolizornaresource_id=#pd-setterinio-storename
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	nicebag1	https://www.dhgate.com/product/quality-1dr-mirror-designer-	https://www.dhgate.com/store/21958351?dspm=pcen.pd.soldby.store.G4
62		bags-womens-small/959687072.html	Qvv9a21ACV4Bu6PlC7&resource_id=#pd-sellerinfo-storename
	ogbags	https://www.dhgate.com/product/disel-jingle-designer-bag-	https://www.dhgate.com/store/21933667?dspm=pcen.pd.soldby.store.tgw
63		handbags-shoulder/923315524.html	OwvH9Tu9Tnr6osGsI&resource_id=#pd-sellerinfo-storename
	oho02	https://www.dhgate.com/product/handbags-bag-disel-designer-	https://www.dhgate.com/store/20967394?dspm=pcen.pd.soldby.store.go0
64		jingle-shoulder/915162005.html	ZIdnp4Gu63OzkgaVx&resource_id=#pd-sellerinfo-storename
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	ok2023	https://www.dhgate.com/product/cool-1dr-sier-real-leather-	https://www.dhgate.com/store/21910902?dspm=pcen.pd.soldby.store.iRZT
65		designer-bag-man/974279756.html	8xT1u36B6nTvWH27&resource_id=#pd-sellerinfo-storename
63		ucoignal-nag-mam/9/42/9/30.illill	ONTITUOODON VVVI 127 & LESOUNCE_IU-#PU-SELLENNINO-SLOTENAINE
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	okk_store	https://www.dhgate.com/product/designer-bag-purse-luxury-	https://www.dhgate.com/store/21803062?dspm=pcen.pd.soldby.store.AQe
66		women-shoulder/950799695.html	mlxBT7WQoJntMTleo&resource_id=#pd-sellerinfo-storename

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		https://www.dhgate.com/product/dis-italy-designer-bag-shoulder-	https://www.dhgate.com/store/21849164?dspm=pcen.pd.soldby.store.ycvL
67	okky_shop	bag-tote/947944735.html	llQp88b2dZlTsGrt&resource_id=#pd-sellerinfo-storename
	oooomygod	https://www.dhgate.com/product/luxury-leather-1dr-shoulder-	https://www.dhgate.com/store/21948898?dspm=pcen.pd.soldby.store.VW
68		bag-designer/970238132.html	Opz16U2F1PoIKRwTGm&resource_id=#pd-sellerinfo-storename
	ootd_handbag	https://www.dhgate.com/product/designer-bag-luxury-handbag-	https://www.dhgate.com/store/21925416?dspm=pcen.pd.soldby.store.B5
69		cross-body-flap/944152433.html	WeTKgQ9cC1A3mtitqg&resource_id=#pd-sellerinfo-storename
	organizer_bag	https://www.dhgate.com/product/mirror-quality-luxury-designer-	https://www.dhgate.com/store/21918069?dspm=pcen.pd.soldby.store.vcK
70		best-bag-cross/936961626.html	1RNdpuTGer09er3ms&resource_id=#pd-sellerinfo-storename
	orig_editon	https://www.dhgate.com/product/designer-bag-purse-white-bag-	https://www.dhgate.com/store/21824978?dspm=pcen.pd.soldby.store.5lct
71		nappa-luxury/951839107.html	p7B7EvEGkhWcNkDa&resource_id=#pd-sellerinfo-storename
	originals_bags	https://www.dhgate.com/product/designer-bag-d-jingle-bag-	https://www.dhgate.com/store/21858720?dspm=pcen.pd.soldby.store.GW
72		luxury-handbag/925037946.html	zRW2M1lKS7gowfzczh&resource_id=#pd-sellerinfo-storename
	pengnabag66688	https://www.dhgate.com/product/famous-brand-bags-women-s-	https://www.dhgate.com/store/21953919?dspm=pcen.pd.soldby.store.NyM
73		handbags-luxury/941528815.html	XTb3chT8hWhoMLpWG&resource_id=#pd-sellerinfo-storename
	000	hadron the consultation of	http://www.dlagata.com/stans/04040050danses.com/stans/dlagata.com/
	penpen888	https://www.dhgate.com/product/dies-el-cross-body-bags-	https://www.dhgate.com/store/21842605?dspm=pcen.pd.soldby.store.ub1
74		shoulder-bag-genuine/926377092.html	rsExUoM0SSdhVZg8J&resource_id=#pd-sellerinfo-storename
	perfect_dh_store	https://www.dhgate.com/product/designer-bag-die-sel-for-	https://www.dhgate.com/store/21962244?dspm=pcen.pd.soldby.store.No8
75	·	women-multi-color/957711337.html	QWGcrCMX74MCQxzq1&resource_id=#pd-sellerinfo-storename
	1	https://www.dhgate.com/product/designer-bag-purse-white-	https://www.dhgate.com/wholesale/products/8aaaa1f18dc5c2f8018dca0a
76	perfectbag5566	nappa-luxury-woman/955800795.html	61864d7f.html#pd-sellerinfo-storename
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	pingbuqingyunbag	https://www.dhgate.com/product/omens-shoulder-bag-disel-	https://www.dhgate.com/store/21962659?dspm=pcen.pd.soldby.store.TKh
77	1	cross-body-designer/949547030.html	ZKe17Fkfcm80x1Tuz&resource id=#pd-sellerinfo-storename
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	plain_bags	https://www.dhgate.com/product/handle-designer-bag-womens-	https://www.dhgate.com/store/21860834?dspm=pcen.pd.soldby.store.Czg
78	l [.] – •	shoulder-bag-flap/921558184.html	88zAyW8U4zZS2bI0h&resource_id=#pd-sellerinfo-storename
	l .	J William Property	

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	ppcbag19	https://www.dhgate.com/product/2024-fashion-flap-jingle-	https://www.dhgate.com/store/21960388?dspm=pcen.pd.soldby.store.upl
79	pp000810	women-shoulder-bags/951102836.html	Gq7QcD7tnwSkgJI36&resource_id=#pd-sellerinfo-storename
	1	https://www.dhgate.com/product/designer-bag-luxury-handbags-	https://www.dhgate.com/wholesale/products/8aaacee98dc5c2e3018dc99e
80	pracebags898	shoulder-bags/973738957.html	28d243c1.html#pd-sellerinfo-storename
	pradahandbag	https://www.dhgate.com/product/mirror-quality-luxury-designer-	https://www.dhgate.com/store/21917958?dspm=pcen.pd.soldby.store.gSTf
81		best-silver/932513686.html	F8Kfas6oWLicVa4T&resource_id=#pd-sellerinfo-storename
	pradahandbags	https://www.dhgate.com/product/luxurys-leather-mens-	https://www.dhgate.com/store/21940452?dspm=pcen.pd.soldby.store.f3m
82		designers-clutch-bag/932610820.html	3WA9eTUTGpkVhtT4d&resource_id=#pd-sellerinfo-storename
	promise bega	https://www.dhgata.com/product/12.colors.womana.mana	https://www.dhgata.com/storo/210507222donm=noon.nd.coldby.storo.7000
83	promise_bags	https://www.dhgate.com/product/13-colors-womens-mens-handbag-brand-a-logo/877930543.html	https://www.dhgate.com/store/21859733?dspm=pcen.pd.soldby.store.ZW0 o3Kb9xvl4eJuAhBVl&resource_id=#pd-sellerinfo-storename
03		Inanubag-brand-a-togo/6//930343.html	05Kb9XVI4e3uAlibVI&leSoulce_lu=#pu-sellelililo-stolellalile
	ptjf8	https://www.dhgate.com/product/white-nappa-woman-shoulder-	https://www.dhgate.com/store/21918615?dspm=pcen.pd.soldby.store.l5Vc
84	puio	designer-crossbody/970682626.html	wPFLqV5AaZ8tz2hy&resource_id=#pd-sellerinfo-storename
	qjybags	https://www.dhgate.com/product/disel-jingle-designer-bag-	https://www.dhgate.com/store/21959174?dspm=pcen.pd.soldby.store.zi1
85		luxury-handbags/953166855.html	Mpz9TxN1UBByc71cT&resource_id=#pd-sellerinfo-storename
	qracebags666	https://www.dhgate.com/product/for-women-designer-bag-purse-	https://www.dhgate.com/store/21958834?dspm=pcen.pd.soldby.store.0eS
86		white-luxury/973780229.html	KOBFfBgHwDPpHevT7&resource_id=#pd-sellerinfo-storename
	racebags777	https://www.dhgate.com/product/designer-bag-luxury-handbags-	https://www.dhgate.com/wholesale/products/8aaac2588dc5c2e5018dc99
87		shoulder-bags/971164219.html	c925642a3.html#pd-sellerinfo-storename
00	realmadrid966	https://www.dhgate.com/product/top-quality-1dr-small-	https://www.dhgate.com/wholesale/products/8aaaac0889bf9a780189cee8
88		messenger-totes-crossbody/972140748.html	65aa4505.html#pd-sellerinfo-storename
	relieve_clothing	https://www.dhgate.com/product/cool-1dr-silver-gold-leather-	https://www.dhgate.com/store/21951374?dspm=pcen.pd.soldby.store.wwT
89	-	designer-bag/971957489.html	EteG3HQeHtOBt5CEQ&resource id=#pd-sellerinfo-storename
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	romantic_bags666	https://www.dhgate.com/product/cool-1dr-silver-real-leather-	https://www.dhgate.com/store/21859730?dspm=pcen.pd.soldby.store.FTa
90	_ •	designer-bag/949091624.html	mvKAwv7m8qWs1rGTJ&resource_id=#pd-sellerinfo-storename
	ruee	https://www.dhgate.com/product/designer-purse-white-bag-	https://www.dhgate.com/store/21963491?dspm=pcen.pd.soldby.store.mG
91		nappa-luxury-woman/955606154.html	HnI4XH4Jpa0H5EEHfL&resource_id=#pd-sellerinfo-storename

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92	saddle_bag8	https://www.dhgate.com/product/messenger-cool-crossbody-bags-womens-denim/857787974.html	https://www.dhgate.com/store/21859002?dspm=pcen.pd.soldby.store.sXn 1TvImgKvxhl6XzSEc&resource_id=#pd-sellerinfo-storename
93	sanjiang_cargo	https://www.dhgate.com/product/cool-1dr-silver-real-leather-bag	https://www.dhgate.com/store/20780858?dspm=pcen.pd.soldby.store.A9f ey3ac04FNzTuKOuzR&resource_id=#pd-sellerinfo-storename
94	sanjiang_items	https://www.dhgate.com/product/multicolors-1dr-mini-handbag-shoulder-bag/951102089.html	https://www.dhgate.com/store/20780830?dspm=pcen.pd.soldby.store.U9 mKHHy9WXCuPHM9z6Ci&resource_id=#pd-sellerinfo-storename
95	sanjiang_products	https://www.dhgate.com/product/1dr-silver-real-leather-designer-bag-man/950954428.html	https://www.dhgate.com/store/20781118?dspm=pcen.pd.soldby.store.k7N Q5Gzpw7vQZZHNib0g&resource_id=#pd-sellerinfo-storename
96	satisfiedbag	https://www.dhgate.com/product/bag-omens-shoulder-disel- cross-body-designer/950074880.html	https://www.dhgate.com/store/21958355?dspm=pcen.pd.soldby.store.RinT vVzOWabVv5uzU0G8&resource_id=#pd-sellerinfo-storename
97	schoolbags	https://www.dhgate.com/product/leather-mini-shoulder-bags- womens-purse-designer/935049647.html	https://www.dhgate.com/store/21917952?dspm=pcen.pd.soldby.store.Twr s7tAQ5cr29Lub3oV5&resource_id=#pd-sellerinfo-storename